

**BROWN
KWON &
LAM LLP**

Brown Kwon & Lam LLP
Attorneys at Law
521 Fifth Avenue, 17th Floor
New York, NY 10175
Tel.: (212) 295-5828
Fax: (718) 795-1642
Email: info@bkllawyers.com

Writer's Direct: Angela Kwon, Esq.
akwon@bkllawyers.com

May 17, 2022

Via ECF

Hon. Lewis J. Liman, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: *Markovic, et al. v. Milos HY, Inc. d/b/a Estiatorio Milos, et al.*
Case No. 22-cv-1412 (LJL)

Dear Judge Liman:

We are counsel for Plaintiffs in the above-referenced action. We write to respectfully request (i) an extension of time to serve the summons and complaint on the individual defendants and (ii) an adjournment of the Initial Conference currently scheduled for May 27, 2022.

Since filing the complaint of this matter, we have been in communication with counsel at Jackson Lewis, P.C. who have informed us that they will be representing the two corporate defendants, Milos HY, Inc. and Milos, Inc., in this matter, but not the individual defendants who are currently residing outside of the country. Plaintiffs are in the process of locating the addresses of six individual defendants in order to effectuate service of process under the Hague Convention.

Based on the foregoing, Plaintiffs respectfully request a sixty (60) day extension of the deadline to serve the summons and complaint on the individual defendants named in this matter. The current deadline is May 19, 2022, and if the extension is granted, the new deadline would be July 18, 2022. In addition, Plaintiffs respectfully request an adjournment of the Initial Conference currently scheduled for May 27, 2022 at 4:00 p.m. until a date after July 18, 2022.

This is the first request for an extension/adjournment. Counsel for the corporate defendants consents to this request.

We thank the Court for its time and consideration.


Respectfully submitted,

/s/ Angela Kwon
Angela Kwon, Esq.

The motion for the limited extension of time to serve the individual defendants is granted. *See Gerena v. Korb*, 617 F.3d 197, 203-04 (2d Cir. 2010) (explaining that court has discretion to extend time for service under Federal Rule of Civil Procedure 4(m)). The initial pretrial conference is adjourned to July 22, 2022 at 3:00 p.m. The parties are directed to dial in to the Court's teleconference line at 888-251-2909, Access Code 2123101#.

cc: all parties via ECF

SO ORDERED.


LEWIS J. LIMAN
United States District Judge

5/19/2022